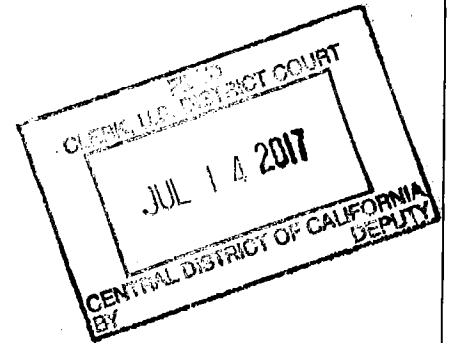


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UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAHSEED AL JIJAKLI,

Defendant.

No. SA17-CR-85

GOVERNMENT'S EX PARTE APPLICATION
FOR ORDER SEALING INDICTMENT AND
RELATED DOCUMENTS; MEMORANDUM OF
POINTS AND AUTHORITIES;
DECLARATION OF MARK TAKLA

(UNDER SEAL)

The government applies ex parte for an order directing that the indictment, arrest warrant, and any related pleadings in the above-titled case, as well as this ex parte application, the memorandum of points and authorities, the declaration of Mark Takla, and this Court's sealing order, be kept under seal until the defendant has been taken into custody on the indictment or the government moves to unseal the indictment, whichever occurs first.


1 This ex parte application is made pursuant to Federal Rule of
2 Criminal Procedure 6(e)(4) and is based on the attached declaration
3 of Mark Takla.

4 Dated: July 14, 2017

Respectfully submitted,

5 SANDRA R. BROWN
6 Acting United States Attorney

7 PATRICK R. FITZGERALD
8 Assistant United States Attorney
9 Chief, National Security Division

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11 MARK TAKLA
12 Assistant United States Attorney

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Attorneys for Plaintiff
UNITED STATES OF AMERICA

DECLARATION OF MARK TAKLA

I, Mark Takla, declare as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California. I represent the government in the prosecution of United States v. Rasheed Al Jijakli, the indictment of which is being presented to a federal grand jury in the Central District of California on July 19, 2017.

2. The defendant charged in the above-captioned indictment has not been taken into custody on the charge contained in the indictment and has not been informed that he is being named as a defendant in the indictment. The likelihood of apprehending the defendant, as well as the safety of arresting officers, might be jeopardized if the indictment in this case were made publicly available before the defendant is taken into custody on the indictment.

3. Accordingly, the government requests that the indictment and related pleadings (but not the arrest warrant) be sealed until the defendant is taken into custody on the charges contained in the indictment and the government either notifies the clerk's office in writing of that fact or moves to unseal the indictment, whichever occurs first.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

DATED: July 14, 2017



MARK TAKLA